

Exhibit B
Supplemental Sampling
Activities -- New
Geographic Areas and
Newly Activated or
Permitted Water Systems
Scope of Work

1.0 New Geographic Areas - Scope of Work

This Scope of Work ("SOW") describes certain supplemental sampling activities that The Chemours Company ("Chemours") will conduct under the Administrative Order on Consent pursuant to the Safe Drinking Water Act that E. I. du Pont de Nemours and Company ("DuPont") and the United States Environmental Protection Agency ("EPA") entered into in 2009 (the "2009 Consent Order") as amended by the First Amendment to Order on Consent among EPA, DuPont and Chemours. If anything in this SOW conflicts with any provision in the 2009 Consent Order as amended, the 2009 Consent Order as amended will control. Both DuPont and Chemours are identified as Respondents in the 2009 Consent Order as amended. While this SOW describes actions that Chemours expects to take, references herein to Chemours should be understood to include DuPont if DuPont is implementing the provisions of the SOW pursuant to the 2009 Consent Order as amended.

During the past approximately 16 years, over 450 drinking water wells have been sampled for perfluorooctanoic acid ("PFOA") in the vicinity of a manufacturing facility known as the Washington Works facility (the "Facility") located in Wood County near Parkersburg, West Virginia. The drinking water wells that have been sampled are located in West Virginia and Ohio. DuPont and, more recently, Chemours have conducted such sampling activities.

Additional surveying and sampling activities of public and private drinking water wells may be warranted based upon current science; changed circumstances; new, site-specific information; and issuance by the EPA on May 19, 2016, of a Lifetime Health Advisory ("HA") value for PFOA of 0.07 micrograms per liter ("µg/L") or parts per billion ("ppb").

Four new geographic areas have been identified where additional surveying and sampling activities are being undertaken to determine if drinking water wells in these areas contain PFOA at concentrations greater than 0.07 ppb. These areas, labeled as Phase III Areas A through D, are shown on Figure 1. Each of these areas has been subdivided into smaller areas ("subareas") and each subarea has been further divided into a "near" and a "far" portion with the near portion being adjacent to previously investigated geographic areas. As discussed hereinafter, a representative number of drinking water wells are being targeted for sampling based on the data available in the previously surveyed and sampled areas and the density of drinking water wells in each subarea. The methods for identifying and sampling drinking water wells in Phase III Areas A through D are described in greater detail below.

In addition, Figure 1 shows an area identified as Phase III Area E in which additional sampling will occur. Specifically, offers will be made to resample private and public water systems located in Phase III Area E where PFOA was detected at concentrations above 0.05 ppb through prior sampling of those private and public water systems. In addition, offers will be made to sample private and public water systems that were newly installed between 2009 and 2016 in Phase III Area E and that were not previously

sampled. As described below, Chemours has received information from county health departments with jurisdiction over the area identified as Phase III Area E identifying such newly activated or permitted drinking water wells that have been installed since 2009 and that are being used as sources of drinking water. Chemours will also contact these county health departments prospectively, on a quarterly basis, to identify newly activated or permitted water systems which are used as drinking water sources so that offers to sample those wells can be made.

1.1 Survey and Identification of Private and Public Water Systems

1.1.1 Private Water Systems and Non-Community Water Systems

Prior to beginning well surveying and sampling activities in the areas identified as Phase III Areas A through D as shown on Figure 1, attempts were made to identify the portions of these areas where public water supplies are not available and where private drinking water wells are most likely to be located. Note that for the purposes of this evaluation and SOW, non-community water systems as defined by EPA and classified as non-transient non-community water systems (“NTNCWSs”) and transient noncommunity water systems (“TNCWSs”), if encountered, are being addressed in the same manner as private water systems.¹ For example, a drinking water well at a gas station or church is, for purposes of this SOW, considered to be a private drinking water well even if it otherwise qualifies as an NTNCWS or a TNCWS. By contrast, public water systems that qualify as community water systems as defined by EPA are being evaluated as described in Section 1.1.2 of this SOW.

The evaluation of areas served by community water systems has included obtaining water line location maps from public water systems and overlaying the locations of the water lines on aerial photographs that have a resolution high enough to observe individual house locations. In addition, information has been requested from each public water system regarding whether water lines, where present, serve houses on only one side of a street or road or serve houses on both sides of a street or road. Phase III

¹ EPA’s regulations implementing the Safe Drinking Water Act define a public water system as “a system for the provision to the public of water for human consumption through pipes or, after August 5, 1998, other constructed conveyances, if such system has at least fifteen service connections or regularly serves an average of at least twenty-five individuals daily at least 60 days out of the year.” 40 C.F.R. § 141.2. EPA further divides public water systems into two categories referred to as “community water systems” and “non-community water systems.” A “community water system” is defined as “a public water system which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents.” 40 C.F.R. § 141.2. A “non-community water system” means a public water system that is not a community water system and that is either a transient non-community water system or a non-transient non-community water system. 40 C.F.R. § 141.2. Both of the subcategories of non-community water systems are further defined by EPA. A “transient non-community water system” is “a non-community water system that does not regularly serve at least 25 of the same persons over six months per year” while a “non-transient non-community water system” is “a public water system that is not a community water system and that regularly serves at least 25 of the same persons over 6 months per year.” 40 C.F.R. § 141.2.

Areas A through D have been divided into subareas and each subarea has been further divided into a near and far portion with the near portion being adjacent to the previously investigated geographic areas as indicated on Figure 1. For each subarea, the distribution of houses and the locations of the water lines are being evaluated and a selection of houses (including non-community public water systems if present), both geographically representative and housing density representative, are being identified for sampling within each subarea, provided that they have private drinking water wells. If clusters of houses are observed which are not served by a public water system, a representative number of houses in each cluster are being identified for sampling.

Sampling within each subarea in the near portion of the subareas in Phase III Area A began on August 1, 2016, and will be subsequently undertaken in Phase III Areas B, C, and D. The water samples are being collected as described in the Revised Perfluorooctanoic Acid Quality Assurance Project Plan for the DuPont Corporate Remediation Group (URS, 2014) which is currently being updated. Sampling will be expanded either within the near portion or into the far portion of a subarea, depending on the particular circumstances that are encountered, if private drinking water wells are identified which contain PFOA at concentrations greater than 0.05 ppb. If such private drinking water wells are located within a cluster of houses, offers will be made to sample all houses within the cluster with private drinking water wells. If such private drinking water wells are located where houses are less densely distributed, the nearest neighboring house(s) with private drinking water wells may be sampled. The additional sampling activities may also be expanded to areas beyond Phase III Areas A through D, if sampling data indicates that PFOA is present at concentrations above 0.05 ppb at the perimeter of the investigated area.

Based on the evaluation described above, teams of two Chemours representatives are visiting the houses targeted for sampling of residential drinking water wells. The field teams are seeking to ascertain whether residential wells that are used for drinking water supplies are present at targeted locations. If a drinking water well is present, Chemours representatives will present the resident or entity with a letter in a form as shown in Attachment 1, which explains Chemours' surveying and sampling program and requests participation in the program. Sampling of the drinking water well can be completed at that time, or sampling can be scheduled at a later time at the convenience of the resident or entity. The same general procedures apply with respect to non-community public water systems (i.e., NTNCWSs and TNCWSs) that are targeted for sampling.

If the resident or entity chooses not to participate in the sampling program, the field team will identify another nearby drinking water well within the subarea (assuming that one exists) and sampling will be offered to that resident or entity. This process will be repeated until representative numbers of samples from private drinking water wells are obtained from the near portion of each subarea. For example, if a cluster of 10 houses is identified which each have drinking water wells, approximately three wells will be identified for sampling. If an area-wide distribution of 20 houses is identified which each have drinking water wells, five or six of the wells will be identified for sampling. The general objective will be to sample approximately 25% to 30% of the total number of

drinking water wells within the near portion of each subarea. The results from these sampling activities will augment the existing database of sampling results.

Water samples from private drinking water wells (including non-community public water systems) will be analyzed for PFOA. The water samples will be collected as described in the Revised Perfluorooctanoic Acid Quality Assurance Project Plan for the DuPont Corporate Remediation Group (URS, 2014) which is currently being updated. Analytical results from each water sample will be provided to EPA and the resident or entity whose well was sampled within seven days after receipt and validation of the results.

The following offers will be made based on the concentrations of PFOA that are detected in the water samples:

- If PFOA is detected in a drinking water well at a concentration above 0.07 ppb, the well will be qualified to receive an offer of treatment using granular activated carbon ("GAC") water treatment technology or a functionally equivalent alternative (as determined by Chemours and approved by EPA) and a temporary alternative drinking water supply will be offered as soon as practicable, but in any event no later than fourteen days after the receipt of validated data. Treatment will be provided as described in the Model Water Treatment Plan approved by EPA.
- If PFOA is detected in a drinking water well at a concentration above 0.05 ppb but less than or equal to 0.07 ppb, an offer will be made to resample the well on a quarterly basis for up to three additional quarters.
 - If the offer is accepted and if PFOA is detected during the additional quarterly sampling events at a concentration exceeding 0.07 ppb, the well will be qualified to receive an offer of treatment using GAC water treatment technology or a functionally equivalent alternative (as determined by Chemours and approved by EPA) and provision of a temporary alternative drinking water supply will be offered. Treatment will be provided as described in the Model Water Treatment Plan approved by EPA.
 - If the offer is accepted and if the concentrations of PFOA do not exceed 0.07 ppb during the additional three quarterly sampling events, no additional offers will be made.
- If PFOA is not detected in a drinking water well at a concentration exceeding 0.05 ppb based on the initial sampling results, the drinking water well will not be qualified for either treatment or additional sampling and no further offers will be made.

1.1.2 Public Water Systems - Community Water Systems

Many public water systems serving the area surrounding the Facility have been sampled for the presence of PFOA. At the present time, seven GAC treatment systems for six public water supply systems qualifying as community water systems (excluding the

water supply system for the Facility itself) have been installed and are being maintained by Chemours. In addition, two GAC treatment systems have been installed to treat water provided by the City of Vienna's public water system. The first of these two GAC systems became fully operational on August 9, 2016. The second GAC system became fully operational on October 15, 2016. The two GAC treatment systems will be maintained by Chemours.

Three public water systems qualifying as community water systems have been identified as potentially serving customers within portions of the areas identified as Phase III Areas A through D. These systems include the public water system operated by the Warren Community Water and Sewer Association, Inc. ("Warren Water") serving portions of Washington County, Ohio, the public water system operated by the City of Marietta Water Treatment Department serving portions of Washington County, Ohio, and the public water system operated by the Williamstown Water Department serving portions of Wood County, West Virginia. Samples of finished water and water from individual production wells from these three public water systems were collected between July 6, 2016 and July 15, 2016, as described in the Revised Perfluorooctanoic Acid Quality Assurance Project Plan for the DuPont Corporate Remediation Group (URS, 2014), which is currently being updated. The concentrations of PFOA measured in the samples collected from these three public water systems were all below 0.05 ppb. The highest concentration of PFOA that was measured was 0.024 ppb. In addition, PFOA was not detected in a number of the samples based on a reporting limit of 0.005 ppb. The sampling results are consistent with prior sampling results obtained in 2007 from samples of finished water and water from individual production wells from the Warren Water and the City of Marietta public water systems. Given the foregoing sampling results, no additional sampling is needed. Analytical results from each water sample were provided to EPA and the operator of the public water system that was sampled within seven days after receipt and validation of the results.

1.2 Newly Activated or Permitted Water Systems

The area designated as Phase III Area E shown on Figure 1 encompasses portions of Washington, Athens, and Meigs Counties in Ohio and Wood County in West Virginia. The county health departments with jurisdiction over the area designated as Phase III Area E have recently been recontacted with the help of EPA to determine whether newly activated or permitted water systems, which are used as sources of drinking water, have been placed into service since the beginning of 2009 in order to verify that information obtained from previous requests, which frequently went unanswered, is complete. Based on an evaluation of the information that has been provided, Chemours has identified approximately 33 newly activated or permitted water systems that may be located within Phase III Area E for which sampling will be offered if the wells are being used to provide drinking water supplies. These water systems were not previously identified by the various county health departments. In addition, based on information previously provided by the various county health departments with jurisdiction over the area designated as Phase III Area E, there are approximately four newly activated or permitted water systems that have not yet been sampled for various reasons.

Chemours will offer to sample these four wells along with the approximately 33 wells described above if the wells are being used to provide drinking water supplies. Chemours' representatives have started the process of contacting the residents by mailing them letters consistent with Attachment 2, which describes the sampling program and requests permission to sample the drinking water wells that are qualified for sampling. Mailing of these letters began on August 3, 2016, and some of the recipients of the letters have already contacted Chemours' representatives.

Following the evaluation of newly activated or permitted water systems from 2009 to the present, Chemours will begin to make written requests on a quarterly basis to the four county health departments described above (i.e., the health departments for Washington, Athens, Meigs, and Wood Counties) to provide information regarding any newly activated or permitted water systems that have been placed into service since receipt of the prior written request from Chemours. Based on the information provided by the county health departments, if such newly activated or permitted water systems are located within Phase III Area E as shown on Figure 1, Chemours' representatives will start the process of contacting the residents to request permission to sample the drinking water wells that are qualified. Newly activated or permitted water systems located within Phase III Areas A through D (or portions thereof) may also be included in these quarterly requests if the results from the supplemental surveying and sampling activities, described above in Section 1.1.1, indicate that these areas warrant being included as part of the health department check process, and if the water systems are qualified for sampling.

Water samples from drinking water wells will be analyzed for PFOA. As indicated above, the water samples will be collected as described in the Revised Perfluorooctanoic Acid Quality Assurance Project Plan for the DuPont Corporate Remediation Group (URS, 2014), which is currently being updated. Analytical results from each water sample will be provided to EPA and the resident or entity whose well was sampled within seven days after receipt and validation of the results. Treatment will be provided as described in the Model Water Treatment Plan approved by EPA. Offers of treatment or additional sampling will be made as described above in Section 1.1.1 based on the concentrations of PFOA that are measured in the water samples.

Chemours will continue to request that the four county health departments identify any newly activated or permitted water systems in the geographical areas falling within Phase III Area E as shown on Figure 1 and relevant portions of Phase III Areas A through D until Chemours demonstrates to the satisfaction of EPA that underground sources of drinking water in those geographical areas (or a subset of those areas) contain PFOA at concentrations of less than or equal to 0.07 ppb for four consecutive quarters.

Figures

Figure 1

Proposed New Geographic Areas and Surveying and Sampling Locations

Attachment 1

Well Use Surveying and Sampling Program - Form of Letter for Residents

[INSERT NAME AND ADDRESS]

[INSERT DATE]

Phase III - Well Use Survey and Sampling Program

In 2009, E. I. du Pont de Nemours and Company (DuPont) and the United States Environmental Protection Agency (EPA) entered into a Consent Order regarding the presence of perfluorooctanoic acid (PFOA) in certain drinking water supplies. As contemplated in the Consent Order, DuPont conducted several phases of surveying and sampling of public and private drinking water wells for PFOA in the vicinity of the Washington Works facility located in Wood County near Parkersburg, West Virginia. In addition, DuPont offered granular activated carbon (GAC) water treatment technology or a functionally equivalent alternative (as determined by DuPont and approved by EPA) to residents with private water systems containing PFOA at concentrations equal to or greater than 0.40 micrograms per liter ($\mu\text{g/L}$) or parts per billion (ppb). This level of PFOA corresponds to the Provisional Health Advisory for PFOA established by EPA in 2009.

On May 19, 2016, EPA issued a Lifetime Health Advisory value for PFOA of 0.07 $\mu\text{g/L}$ based on information contained in a document titled *Health Effects Support Document for Perfluorooctanoic Acid (PFOA)* (EPA, 2016) (<https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>). Health advisories apply to substances that are not subject to national primary drinking water regulations under the Safe Drinking Water Act and serve as informal technical guidance to assist federal, state, and local officials, and managers of public or community water systems by providing information on the health effects of and methods to sample and treat the substances in drinking water for which health advisories are established. In this case, the Lifetime Health Advisory value for PFOA issued by EPA is intended to be protective of both individuals consuming drinking water containing PFOA over a 70-year period (i.e., lifetime exposure) and pregnant women and breast and bottle-fed infants over shorter time periods.

The Chemours Company (Chemours), which now owns the Washington Works facility, is beginning an additional phase of surveying and sampling activities. Chemours will gather information regarding the potential presence of PFOA in drinking water supplies in new geographic areas for which no PFOA sampling results exist. We are asking residents within these specific geographic areas to participate in a well use survey and sampling program. If you have a drinking water well and are interested in having it sampled and analyzed for PFOA at no cost to you, please contact Chemours' representative, Ms. Ali Pearce (304-588-1524). The sampling will be scheduled at your convenience and requires a technician to come to your house for less than 10 minutes to collect a small container of water. If your well is sampled, you will receive the results for your well within 6-8 weeks after sampling is completed.

Drinking water wells which contain PFOA at concentrations exceeding 0.07 $\mu\text{g/L}$ will be eligible for an offer of treatment using GAC water treatment technology or a functionally equivalent alternative (as determined by Chemours and approved by EPA). If the concentration of PFOA initially measured in the drinking water well is between 0.05 $\mu\text{g/L}$ and 0.07 $\mu\text{g/L}$, Chemours will offer to monitor the concentration of PFOA in the drinking water well on a quarterly basis (once every three months) for up to three additional quarterly monitoring events. If the concentration of PFOA that is detected in such a drinking water well during any of those monitoring events exceeds 0.07 $\mu\text{g/L}$, that well will be eligible for treatment. If PFOA is not detected in the drinking

water well at a concentration exceeding 0.05 µg/L based on the initial sampling results, the drinking water well will not be qualified for either treatment or additional sampling and no further offers will be made.

Should you have any questions regarding the well use surveying and sampling program, please contact Ms. Jennifer Wilson (EPA Region 5) at 312-353-3115 if you live in Ohio or Mr. Roger Reinhart (EPA Region 3) at 215-814-5462 if you live in West Virginia. We thank you for your help and cooperation with this well use surveying and sampling program.

Sincerely,
The Chemours Company

Andrew S. Hartten
Principal Remediation Project Manager
Corporate Remediation Group

Attachment 2

Sampling of Newly Activated or Permitted Water Systems - Form of Letter for Residents

[INSERT NAME AND ADDRESS]

[INSERT DATE]

Sampling of Newly Activated or Permitted Water Systems

In 2009, E. I. du Pont de Nemours and Company (DuPont) and the United States Environmental Protection Agency (EPA) entered into a Consent Order regarding the presence of perfluorooctanoic acid (PFOA) in certain drinking water supplies. As contemplated in the Consent Order, DuPont offered sampling of newly installed drinking water wells in the vicinity of the Washington Works facility located in Wood County near Parkersburg, West Virginia. If such sampling showed PFOA to be present in water supplies at measured concentrations equal to or greater than 0.40 micrograms per liter ($\mu\text{g/L}$) or parts per billion (ppb), DuPont also offered installation of granular activated carbon (GAC) water treatment technology or a functionally equivalent alternative (as determined by DuPont and approved by EPA) for such wells. This level of PFOA corresponds to the Provisional Health Advisory for PFOA established by EPA in 2009.

On May 19, 2016, EPA issued a Lifetime Health Advisory value for PFOA of 0.07 $\mu\text{g/L}$ based on information in a document entitled *Health Effects Support Document for Perfluorooctanoic Acid (PFOA)* (EPA, 2016) (<https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>). Health advisories apply to substances that are not subject to national primary drinking water regulations under the Safe Drinking Water Act and serve as informal technical guidance to assist federal, state and local officials, and managers of public or community water systems by providing information on the health effects of and methods to sample and treat the substances in drinking water for which health advisories are established. In this case, the Lifetime Health Advisory value for PFOA issued by EPA is intended to be protective of both individuals consuming drinking water containing PFOA over a 70-year period (i.e., lifetime exposure) and pregnant women and breast and bottle-fed infants over shorter time periods.

In light of the foregoing, The Chemours Company (Chemours), which now owns and operates the Washington Works facility, is offering to sample newly installed drinking water wells and install GAC water treatment technology or a functionally equivalent alternative (as determined by Chemours and approved by EPA) to residents with private water systems containing PFOA at measured concentrations greater than 0.07 $\mu\text{g/L}$. Chemours will offer to monitor the concentration of PFOA in a newly installed drinking water well on a quarterly basis (once every three months) for up to three additional quarterly monitoring events if the concentration of PFOA initially measured in the newly installed drinking water well is between 0.05 $\mu\text{g/L}$ and 0.07 $\mu\text{g/L}$. If the concentration of PFOA that is detected in such a drinking water well during any of those monitoring events exceeds 0.07 $\mu\text{g/L}$, that well will be eligible for treatment. If PFOA is not detected in the drinking water well at a concentration exceeding 0.05 $\mu\text{g/L}$ based on the initial sampling results, the drinking water well will not be qualified for either treatment or additional sampling and no further offers will be made.

Your well was identified by one of four County Health Departments (including the Health Departments for Washington, Athens and Meigs Counties in Ohio, and the Health Department for Wood County in West Virginia) as having been installed between 2009 and 2016 and as potentially qualifying for sampling. If your well has been installed, is being used for drinking water purposes and is located within the geographic sampling area, Chemours is offering to

sample the well for PFOA at no cost to you. The sampling will be scheduled at your convenience and requires a technician to come to your house for less than 10 minutes to collect a small container of water. If your well is sampled, you will receive the results for your well within approximately 6-8 weeks after sampling is completed.

If you are interested in accepting this offer, please contact Chemours' representative Ms. Ali Pearce at 304-588-1524 to determine qualification and schedule sampling, if sampling is offered. If you choose to decline this offer, please sign below and return this signed letter in the self-addressed, stamped envelope.

Should you have any questions regarding the sampling program, please contact Ms. Jennifer Wilson (EPA Region 5) at 312-353-3115 if you live in Ohio or Mr. Roger Reinhart (EPA Region 3) at 215-814-5462 if you live in West Virginia.

Sincerely,

Andrew S. Hartten
Principal Remediation Project Manager
Chemours Corporate Remediation Group

I decline Chemours' offer of sampling of my drinking water well for PFOA.

(Owner's Signature, Address and Date of Decline)